# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

J. Snapp

Art Unit: 2682

Serial No.:

09/476,461

Examiner: C. Appiah

Filed:

**December 30 1999** 

Docket No. 455.US

For:

METHOD OF AND APPARATUS FOR USE IN FORWARDING CALLS INTENDED FOR ROAMING SUBSCRIBER UNITS

# **CERTIFICATION UNDER 37 CFR § 1.8**

I, Terrance A. Meador, hereby certify that the documents referred to as enclosed herein are being deposited with the United States Postal Service as first class mail on this date, December 23, 2003, in an envelope addressed to: Mail Stop APPEAL BRIEFS-PATENTS, Box 1450, Commissioner for Patents, Alexandria A 22313-1450

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## **BRIEF ON APPEAL**

In response to the Final Action mailed July 24, 2003, and in view of the Notice of Appeal mailed on October 24, 2003, the applicant submits this Brief on Appeal. The Board is respectfully requested to note the change of correspondence address for this application.

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# **REAL PARTY IN INTEREST**

The real party in interest is AT&T Wireless Services, Inc., the assignee of rights in this application.

# **RELATED APPEALS**

There are no related appeals.

# STATUS OF THE CLAIMS

Claims 1-21 have all been rejected in the Final Action mailed July 24, 2003.

# **STATUS OF AMENDMENTS**

The Amendments submitted on May 15, 2002, on November 27, 2002, and May 27, 2003 have all been entered. No amendment has been refused entry.

#### **SUMMARY OF THE INVENTION**

The invention concerns forwarding a telephone call originating in one network and directed to a subscriber unit of the one network who is roaming in another network. See FIG. 1. When a subscriber unit of the one network, an ANSI-41 network, for example, roams in the area served by the other network, a GSM network, for example, there is no cost-effective way to forward a call originating in the first network when the subscriber unit is active in the other network and the subscriber unit is either busy or not answered. In this regard either the call does not get forwarded, or it is forwarded at the price of two long distance charges, one to send the call to the network where the subscriber is roaming, and one more to forward it back to the subscriber's network. See the specification at page 3, lines 10-28. Convenience and better service would be provided if the call could be forwarded in response to status information from the other network to a designated forward-to number in the subscriber's network. See the specification at page 5, lines 3-10.

Under the condition that the two networks are linked by a "mobility gateway", when the subscriber of the one network roams in the other network, a mobility switching center (MSC) of the other network nearest the roaming subscriber unit ("the serving MSC") requests from the mobility gateway a "temporary transfer-to number". The request prompts the mobility gateway to confirm the subscriber's good standing with the subscriber's network and, with confirmation, to assign the temporary transfer-to telephone number. A temporary transfer-to telephone number (defined in the specification at page 6, lines 15-28, and illustrated in FIG. 5) is associated with the roaming subscriber unit and "homed" on a "redirection MSC"; that is to say, it is a telephone number that may be used to direct a message to the redirection MSC when a telephone call is made to the roaming subscriber unit under the conditions described above.

Now, presume that the mobility gateway receives a message indicating that a telephone call has been made to the subscriber unit. The mobility gateway then initiates a series of message exchanges that result in the call ultimately being routed to the serving MSC of the network in which the subscriber unit is roaming. Receiving the call

prompts the serving MSC of the other system to page the subscriber unit. If the subscriber unit is active and the page is unanswered or the subscriber unit is busy, the serving MSC uses the temporary transfer-to number to transfer the call for the subscriber unit to the redirection MSC. This prompts the redirection MSC to send a location request message to the mobility gateway. Receiving a location request message from a redirection MSC homed by a temporary transfer-to number prompts the mobility gateway to initiate another message sequence with elements of the subscriber unit's network. This message sequence ends with a redirection request message sent by the mobility gateway to a gateway MSC in the subscriber's network that results in the telephone call being directed to the forwarding number in the subscriber unit's network. See the specification at page 10, line 11 through page 11, line 20 and at FIGS. 3A and 3B. Because the telephone call is forwarded in the subscriber's network in response to a redirection request message, only a single long distance charge (for routing the call to the MSC of the other system) is incurred for the process.

# **ISSUES**

# The issues are:

- 1. whether claims 1-21 are unpatentable under 35 USC §103 for obviousness over Hauser et al. (USPN 5734700) in view of Azer (USPN 5481592); and
- 2. whether claims 1, 8, 15, and 19 are unpatentable under 35 USC §103 for obviousness over Houde et al. (USPN 5978678) in view of Azer.

# **GROUPING OF CLAIMS**

Claims 1-7 stand or fall together.

Claims 8-14 stand or fall together.

Claims 15-18 stand or fall together.

Claims 19-21 stand or fall together.

#### **ARGUMENT**

# Rejection of claims 1-21 over Hauser in view of Azer

Claims 1-21 are rejected for obviousness over Hauser in view of Azer. That rejection is incorrect and should be withdrawn for the following reasons.

#### Prima facie Obviousness

*Prima facie*, rejection of a claim for obviousness over a combination of references requires some suggestion or motivation to combine the references, a reasonable expectation of success, and the inclusion of all elements and limitations of the rejected claim in the combination or by suggestion. See MPEP 2142, et seq.

### Claims 1-7

Claim 1 is directed to a method for use in a mobility gateway by which a call directed to a roaming subscriber unit is forwarded. The method includes:

"storing, at the mobility gateway, a plurality of temporary transfer-to telephone numbers; and

selecting, for association with the roaming subscriber unit, one of the temporary transfer-to telephone numbers."

### **Mobility Gateway**

Claims 1-7 cover a method for use "in a mobility gateway". The claim includes the step of "storing, at the mobility gateway, a plurality of temporary transfer-to telephone numbers ... ". The term "mobility gateway" has a clear and well-understood meaning in the mobile communications arts. In this regard, see the previously-cited *Ericsson Review* article entitled "Jambala Mobility Gateway-Convergence and Inter-system Roaming". This reference is included in Appendix B. The applicant has used the term "mobility gateway" throughout the specification and claims in a manner that is altogether consistent with its accepted meaning. See for example, the "mobility gateway" 102 described at page 7, lines 7-22, and illustrated in Fig. 1 of the specification.

During examination, it has been proposed that "Hauser discloses a subscriber unit roaming between two dissimilar wireless systems" and that the dissimilar wireless systems are linked by a "bridgehead operating as an internetwork junction (function of a mobility gateway)". See the Office Action dated 2/26/2003 at page 2, section 2.

In fact, Hauser denotes separate, independent elements, as follows: "a bridgehead 11 situated in the USA ", "a Mobile Services Switching Center (MSC) 15 in Europe", "a Virtual Home Location Register (VHLR) 17" (located in Europe per FIG 1), and "a MSC 19" (also located in Europe per FIG 1). A diligent reading of Hauser has not yielded a reference to these elements individually or collectively as a "gateway" or as a "mobility gateway". Indeed, none of these elements is a gateway. The bridgehead 11 bears a resemblance to a "bridge", but that element is distinct and different from a "gateway" in the telecommunication arts. See the definition of "bridge" at page 302 of *Newton's Telecom Dictionary* in Appendix C. Hauser, at Col. 2, lines 34-36, does correspond the bridgehead 11 to a "gateway mobile services switching center", but that element is distinct from the "mobility gateway" of claims 1-7. In this regard, see Fig. 1 of this application and the accompanying description at page 7, lines 7-28 where the mobility gateway 102 operates in conjunction with a "gateway mobile switching center (MSC) 112" and a "GSM mobile switching center (MSC) 104". Hauser does not include either the structure or the "functionality" of a "mobility gateway".

Azer describes a "gateway switch" as a device that communicates from one country to another, or that connects a call from a country to the Inmarsat system. See Azer at column 3, lines 1-11. A "mobility gateway" on the other hand, supports international roaming capability. See the *Ericsson Review* article. Azer's gateway switch does not evidently support "roaming" capability, and therefore cannot be read as a "mobility gateway."

# Roaming Subscriber Unit

Further, claims 1-7 concern a method "by which a call directed to a roaming subscriber unit is forwarded". A "roaming subscriber unit" is a subscriber unit which seeks service on a network other than its home network. The act of "roaming" requires a number of steps and a distinct system functionality that gives a subscriber unit the ability to make and receive telephone calls in the other network. Hauser's system does not provide service to a "roaming" subscriber unit, such as one brought from he USA to a GSM network area because services are not available to such units in a GSM network. "Generally it is not possible for subscribers of non-GSM standard mobile communication networks to use services of GSM mobile communication networks or services of other mobile communication networks." Hauser, column 1, lines 34-38. Instead, it provides service to a "temporary GSM subscriber" in the GSM network. Hauser, column 2, lines 19-25 and lines 60-67. Calls to the temporary GSM subscriber's non-GSM home

network telephone number are forwarded to a bridge number and from there to the temporary GSM subscriber number. There are no "roaming subscriber" units in Hauser. X

In Azer there are ocean-going vessels that subscribe to the Inmarsat system. In that regard, they can be characterized as "mobile units." However, the ocean-going vessels are not called or described, and cannot be characterized as "roaming" mobile units because they only take calls in one or another zone of the Inmarsat system. The ocean-going vessels do not seek services from any other network system. Accordingly, there is no "roaming subscriber unit" in Azer.

#### A Call is Forwarded

In claims 1-7, a call directed to a roaming subscriber unit is "forwarded". In this regard, a forwarded call is one that is directed to a device having another number than that called. In Azer, on the other hand, calls are "completed", not "forwarded". "This invention relates to a system for completing calls to mobile telephones, more particularly to telephones on ships at sea". See Azer at column 1, lines 5-9. That is to say, a telephone call to a telephone on an ocean-going actually arrives at the telephone, not at some other device with another telephone number. In applying Azer to these claims, "calling" cannot be read as "forwarding". In fact, no telephone call in Azer is "forwarded".

# **Temporary Transfer-To Numbers**

As set forth in the Amendment and Request for Consideration submitted May 27 2003, at page 6, fourth paragraph, a "temporary transfer-to telephone number" is defined in detail in the specification at page 6, lines 15-28. In this regard, "temporary transfer-to telephone numbers may be dynamically assigned to roaming subscriber units," and a temporary transfer-to number "is a call forwarding number that is used in an intermediate and temporary fashion between the subscriber telephone number and the call forwarding number associated with the subscriber unit." It is asserted in the Final Action at page 2, section 1 that these features of temporary transfer-to numbers are not recited in the rejected claims, and "limitations from the specification are not read into the claims." No such action is necessary or proposed by the applicant. Instead, the applicant merely seeks to establish that the term "temporary transfer-to numbers", read and understood in light of the specification, constitutes a limitation in the claims that is absent from Azer. That is to say, Azer does not disclose or suggest "transfer-to numbers" in view of the meaning given that term by the applicant, which is found in the specification. The Azer system automatically changes the prefix region code and "redials" a call if the previous call attempt cannot be completed. In this regard, the Azer system performs an iterative

"search" in an attempt to complete the call using the appropriate region code with the same ship identification number. The region codes are evidently fixed prefixes; they are not "temporary", and are not "telephone numbers".

Accordingly, since Hauser and Azer both omit a "mobility gateway" and "transfer to numbers", their combination omits the act of "storing, at the mobility gateway, a plurality of temporary transfer-to telephone numbers". Further, since neither Hauser nor Azer describes or suggests a "roaming subscriber unit", their combination omits the act of "selecting, for association with the roaming subscriber unit, one of the temporary transfer-to telephone numbers". Claims 1-7 are therefore not obvious in view Hauser in view of Azer.

### Claims 8-14

Claim 8 is directed to a mobility gateway used between an ANSI-41-based network and a GSM-based network, which includes a processor, a "memory for storing a plurality of temporary transfer-to telephone numbers homed on one or more mobile switching centers (MSCs)", in which the processor is operative for "selecting one of the plurality of temporary transfer-to telephone numbers for association with a roaming subscriber unit."

For reasons given above, neither Hauser nor Azer describes a "mobility gateway" or a "temporary transfer-to telephone number". Further, claim 8 explicitly recites that the temporary transfer-to telephone numbers are "homed on one or mobile switching centers". In Hauser, an intermediate number (+1 212 klmnopq) is converted to a temporary GSM subscriber number (+49 171 rstuvwx), but neither the intermediate number nor the GSM subscriber number is "homed" on any mobile switching center. In Azer, there are no mobile switching centers, and there are no numbers that are "homed" to any element that corresponds to a switching center. Further, for reasons given above, neither Hauser nor Azer describes or suggests a "roaming subscriber unit". Accordingly, neither Hauser nor Azer, nor their combination, describes or suggests a processor in combination with a "memory for storing a plurality of temporary transfer-to telephone numbers homed on one or more mobile switching centers (MSCs)", such that the processor is capable of "selecting one of the plurality of temporary transfer-to telephone numbers for association with a roaming subscriber unit." Claims 8-14 are therefore not obvious over Hauser in view of Azer.

### **Claims 15-21**

Claim 15 covers a method for use in forwarding a call intended for a subscriber unit that includes the acts of "receiving and storing information related to a call request for a roaming subscriber unit", and then "after receiving and storing, receiving a location request message from a mobile switching center which homes a temporary transfer-to telephone number associated with the roaming subscriber unit; associating the location request message with the call request for the roaming subscriber unit; and after associating, sending a redirection request message to a gateway mobile switching center which received the call request for the roaming subscriber unit."

For reasons given above, neither Hauser nor Azer describes or suggests "a roaming subscriber unit" or "temporary transfer-to numbers". Azer does not teach "forwarding" calls, only "completing" them. Further, neither Hauser nor Azer describes or suggests "a location request message" from a mobile switching center that "homes a temporary transfer-to telephone number associated with" a roaming subscriber unit, or a "redirection request message". In Hauser, there are "interrogations", for example at column 4, lines 16-25, but none of these interrogations "homes" any telephone number "associated" with any element, let alone a "roaming subscriber unit" which Hauser's system does not serve. Furthermore, none of these "interrogations' constitutes a "redirection request message" to a mobile switching center. No other messages are described in Hauser. Azer specifically identifies as an advantage of his system its lack of need for "an adjunct processor and the resulting time delay expense while the switch dispatches a request and waits for results." See Azer at column 4, lines 20-25. Thus, motivated by the need to avoid "time delay" in sending and responding to messages, Azer teaches away from using a "location request message", a "redirection request message", or any other message to complete calls, let alone forwarding them. Neither Hauser nor Azer, nor their combination, describes or suggests a "location request message" and a "redirection request message". Claims 15-18 are therefore not obvious over Hauser in view of Azer.

### Claims 19-21

Claim 19 covers a method for use in a mobility gateway, in which a telephone number is selected "for association with a roaming subscriber unit." Then, a message having the telephone number is sent to a mobile switching center serving the roaming subscriber unit. Next, information related to a call request for the roaming subscriber unit

is received and stored. After the information is received and stored, the method includes "receiving a location request message from a mobile switching center which homes the telephone number" and "associating the location request message with the call request for the roaming subscriber unit". After the act of association, "a redirection request message" is sent "to a gateway mobile switching center which received the call request for the roaming subscriber unit."

For reasons given above, neither Hauser nor Azer describes or suggests "a roaming subscriber unit" or "temporary transfer-to numbers". Further, as already explained, neither Hauser nor Azer describes or suggests "a location request message" from a mobile switching center that "homes a temporary transfer-to telephone number associated with" a roaming subscriber unit, or sending a "redirection request message" to "a gateway mobile switching center which received the call request for the roaming subscriber unit." Claims 19-21 are therefore not obvious over Hauser in view of Azer.

### Rejection of claims 1, 8, 15, and 19 over Houde in view of Azer

Claims 1, 8, 15, and 19 are rejected for obviousness over Houde in view of Azer. That rejection is incorrect and should be withdrawn for the following reasons.

### Claim 1

Claim 1 is directed to a method for use in a mobility gateway by which a call directed to a roaming subscriber unit is forwarded. The method includes:

"storing, at the mobility gateway, a plurality of temporary transfer-to telephone numbers; and

selecting, for association with the roaming subscriber unit, one of the temporary transfer-to telephone numbers."

At column 1, lines 18-20, Houde says: "The present invention relates to cellular telephone networks and, in particular, to the routing of telephone calls to and from mobile stations engaged in international roaming." In Azer, calls are completed. "This invention relates to a system for completing calls to mobile telephones, more particularly to telephones on ships at sea". See Azer at column 1, lines 5-9. In other words, Houde and Azer are both directed to completing calls to mobile units; neither is concerned with forwarding calls; neither reference faced the problem of forwarding calls intended for a roaming subscriber unit.

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Further, as admitted in the Final Action at page 8, lines 3, 4, Houde "fails to explicitly teach storing a plurality of transfer-to telephone numbers homed on one or more MSCs...". In fact, neither does Azer. The term "temporary transfer-to numbers", as read and understood in light of the specification, constitutes a limitation in the claims that is absent from Azer. That is to say, Azer does not disclose or suggest "transfer-to numbers" in view of the meaning given that term by the applicant, which is found in the specification. The Azer system automatically changes the prefix region code and "redials" a call if the previous call attempt cannot be completed. In this regard, the Azer system performs an iterative "search" in an attempt to complete the call using the appropriate region code with the same ship identification number. The region codes are permanently fixed prefixes; they are not "temporary", and are not "telephone numbers". Furthermore, Azer does not associate prefixes with mobile units. Instead, each region code corresponds to an coast earth station or satellite. Claim 1 is therefore not obvious over Houde in view of Azer.

### Claim 8

Claim 8 is directed to a mobility gateway used between an ANSI-41-based network and a GSM-based network, which includes a processor, a "memory for storing a plurality of temporary transfer-to telephone numbers homed on one or more mobile switching centers (MSCs)", in which the processor is operative for "selecting one of the plurality of temporary transfer-to telephone numbers for association with a roaming subscriber unit."

For reasons given above, neither Houde nor Azer describes a "temporary transfer-to telephone number". Further, claim 8 explicitly recites that the temporary transfer-to telephone numbers are "homed on one or mobile switching centers". In Azer, there are no mobile switching centers, and there are no numbers that are "homed" to any element that corresponds to a switching center. The region codes are permanently fixed prefixes; they are not "temporary", and are not "telephone numbers". Furthermore, Azer does not associate prefixes with mobile units. Instead, each region code corresponds to an coast earth station or satellite. Claim 8 is therefore not obvious over Houde in view of Azer.

## Claim 15

Claim 15 covers a method for use in forwarding a call intended for a subscriber unit that includes the acts of "receiving and storing information related to a call request for a roaming subscriber unit", and then "after receiving and storing, receiving a location request message from a mobile switching center which homes a temporary transfer-to telephone number associated with the roaming subscriber unit; associating the location request message with the call request for the roaming subscriber unit; and after associating, sending a redirection request message to a gateway mobile switching center which received the call request for the roaming subscriber unit."

For reasons given above, neither Houde nor Azer describes or suggests "forwarding a call" or "temporary transfer-to numbers". Both references teach "completing" calls, not "forwarding" them. Further, neither Hauser nor Azer describes or suggests "receiving a location request message from a mobile switching center which homes a temporary transfer-to telephone number associated with the roaming subscriber unit". In Houde, a location request signal 202 is issued by a "gateway switching node 14", (column 6, lines 20-22 and FIG. 3 of Houde), but there is no teaching or suggestion that the switching node 14 "homes a temporary transfer-to telephone number associated with the roaming subscriber unit". Further, the location request signal 202 merely elicits a "mobile station location associated with a serving node" (Houde, column 6, lines 22, 23). There is no teaching or suggestion in Houde of "associating the location request message with the call request for the roaming subscriber unit" and then "sending a redirection request message to a gateway mobile switching center which received the call request for the roaming subscriber unit." In Houde, a "routing request signal 206" is sent to a switching node 34, but the switching node is one in the system in which the unit is roaming, not the switching node that received a call request for the unit. (Houde, column, 6, lines 24-26). Claim 15 is therefore not obvious over Houde in view of Azer.

#### Claim 19

Claim 19 covers a method for use in a mobility gateway, in which a telephone number is selected "for association with a roaming subscriber unit." Then, a message having the telephone number is sent to a mobile switching center serving the roaming subscriber unit. Next, information related to a call request for the roaming subscriber unit is received and stored. After the information is received and stored, the method includes

"receiving a location request message from a mobile switching center which homes the telephone number" and "associating the location request message with the call request for the roaming subscriber unit". After the act of association, "a redirection request message" is sent "to a gateway mobile switching center which received the call request for the roaming subscriber unit."

For reasons given above, neither Houde nor Azer describes or suggests "temporary transfer-to numbers". Further, as already explained, neither Houde nor Azer describes or suggests "a location request message" from a mobile switching center that "homes a temporary transfer-to telephone number associated with" a roaming subscriber unit, or sending a "redirection request message" to "a gateway mobile switching center which received the call request for the roaming subscriber unit." Claim 19 is therefore not obvious over Houde in view of Azer.

#### SUMMARY

In view of the arguments set forth in this brief, and in view of other arguments and evidence of record in this application, it is submitted that all of the claims in this application recite subject matter that is patentably distinct from the references disclosed and cited. Therefore, the Board is respectfully requested to direct that the rejections be withdrawn and the application allowed.

Respectfully submitted

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#### **APPENDIX A**

1. (Original) A method for use in a mobility gateway for forwarding a call directed to a roaming subscriber unit, the method comprising:

storing, at the mobility gateway, a plurality of temporary transfer-to telephone numbers; and

selecting, for association with the roaming subscriber unit, one of the temporary transfer-to telephone numbers.

- 2. (Original) The method according to claim 1, wherein the temporary transfer-to telephone number is homed on a mobile switching center that is different from a mobile switching center serving the roaming subscriber unit.
- 3. (Original) The method according to claim 1, further comprising: sending a message having the temporary transfer-to telephone number to a mobile switching center serving the roaming subscriber unit.
- 4. (Amended) The method according to claim 3, further comprising: after selecting and sending, receiving and storing information related to a call request for the roaming subscriber unit; and

after receiving and storing, receiving a location request message from a mobile switching center which homes the temporary transfer-to telephone number.

- (Original) The method according to claim 4, further comprising: associating the location request message with the call request for the roaming subscriber unit.
- 6. (Original) The method according to claim 4, further comprising: associating the location request message with the call request for the roaming subscriber unit based at least in part on the temporary transfer-to telephone number.
- 7. (Original) The method according to claim 5, further comprising: after associating, sending a redirection request message to a gateway mobile switching center which received the call request.

8. (Original) A mobility gateway for use in connection between an ANSI-41-based network and a GSM-based network, the mobility gateway comprising:

memory for storing a plurality of temporary transfer-to telephone numbers

said processor being operative for:

homed on one or more mobile switching centers (MSCs);

a processor;

selecting one of the plurality of temporary transfer-to telephone numbers for association with a roaming subscriber unit.

- 9. (Original) The mobility gateway according to claim 8, wherein the selected temporary transfer-to telephone number associated with the roaming subscriber unit is homed on an ANSI-41 MSC different from a GSM MSC serving the roaming subscriber unit.
- 10. (Original) The mobility gateway according to claim 8, wherein said processor is further operative for:

sending a message having the temporary transfer-to telephone number to a GSM MSC serving the roaming subscriber unit.

11. (Original) The mobility gateway according to claim 10, wherein said processor is further operative for:

after selecting and sending, receiving and storing information related to a call request for the roaming subscriber unit; and

after receiving and storing, receiving a location request message from an MSC which homes the temporary transfer-to telephone number.

12. (Original) The mobility gateway according to claim 11, wherein said processor is further operative for:

associating the location request message with the call request for the roaming subscriber unit.

13. (Original) The mobility gateway according to claim 11, wherein said processor is further operative for:

associating the location request message with the call request for the roaming subscriber unit based at least in part on the temporary transfer-to telephone number.

14. (Original) The mobility gateway according to claim 12, wherein said processor is further operative for:

after associating, sending a redirection request message to an ANSI gateway MSC which received the call request.

15. (Original) A method for use in forwarding a call intended for a subscriber unit, comprising:

receiving and storing information related to a call request for a roaming subscriber unit;

after receiving and storing, receiving a location request message from a mobile switching center which homes a temporary transfer-to telephone number associated with the roaming subscriber unit;

associating the location request message with the call request for the roaming subscriber unit; and

after associating, sending a redirection request message to a gateway mobile switching center which received the call request for the roaming subscriber unit.

16. (Original) The method according to claim 15, further comprising, prior to receiving and storing the information related to the call request:

selecting the temporary transfer-to telephone number for association with a roaming subscriber unit; and

sending a message having the temporary transfer-to telephone number to a mobile switching center serving the roaming subscriber unit.

17. (Original) The method according to claim 15, further comprising:
wherein the receiving and storing of information related to the call request
includes receiving and storing information comprising subscriber identification
information and call identification information; and

wherein sending the redirection request message includes sending the call identification information.

18. (Original) The method according to claim 15, further comprising: wherein receiving the location request message comprises receiving the temporary transfer-to telephone number; and

wherein associating the location request message with the call request comprises associating based on the temporary transfer-to telephone number.

19. (Original) A method for use in a mobility gateway, comprising: selecting a telephone number for association with a roaming subscriber unit;

sending a message having the telephone number to a mobile switching center serving the roaming subscriber unit;

after selecting and sending, receiving and storing information related to a call request for the roaming subscriber unit;

after receiving and storing, receiving a location request message from a mobile switching center which homes the telephone number;

associating the location request message with the call request for the roaming subscriber unit; and

after associating, sending a redirection request message to a gateway mobile switching center which received the call request for the roaming subscriber unit.

20. (Original) The method according to claim 19, further comprising:
wherein the receiving and storing of information related to the call request
includes receiving and storing information comprising subscriber identification
information and call identification information; and

wherein sending the redirection request message includes sending the call identification information.

21. (Original) The method according to claim 19, wherein the mobile switching center serving the roaming subscriber unit comprises a GSM mobile switching center and the gateway mobile switching center comprises an ANSI gateway mobile switching center.

# **APPENDIX B**

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